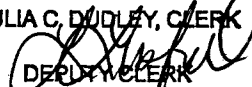


UNITED STATES DISTRICT COURT

for the
Western District of Virginia

AUG 05 2014

JULIA C. DUDLEY, CLERK
BY: 
DEPUTY CLERKIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)21011 Lovers Lane
Bristol, VA

Case No. 1:14MJ00199

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):
21011 Lovers Lane, Bristol, VA (to include the residence, curtilage, outbuildings, structures, persons present, and vehicles present). Attachment A consists of an aerial photograph of the residence.

located in the Western District of Virginia, there is now concealed (identify the person or describe the property to be seized):
See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

| Code Section | Offense Description |
|----------------------|---|
| 21 USC 846/841(a)(1) | Conspiracy to Manufacture Methamphetamine |
| 21 USC 841(a)(1) | Manufacture Methamphetamine |

The application is based on these facts:

See Attachment C

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Brian Snedeker, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 8/5/14

City and state: Abingdon, Virginia

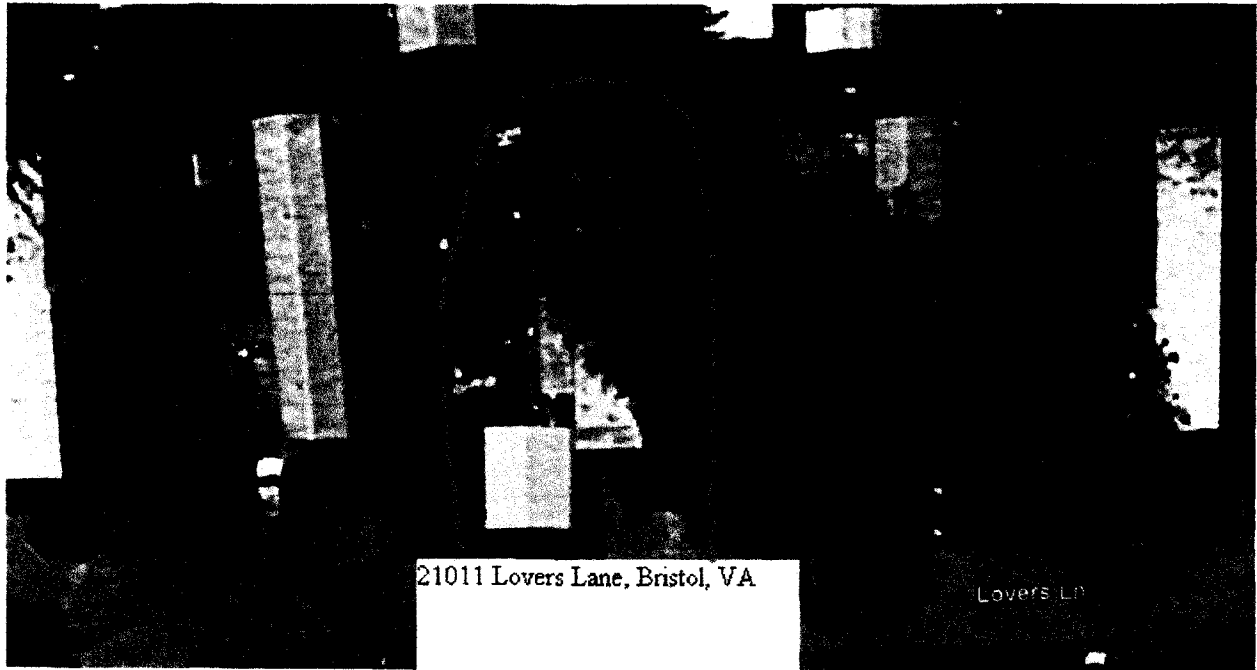


Judge's signature

Pamela Meade Sargent, USMJ

Printed name and title

ATTACHMENT A



ATTACHMENT B

1. Methamphetamine laboratory precursors, chemicals, and equipment (and original packaging of same) including the following: pseudoephedrine, ammonium nitrate (e.g. instant cold packs), lithium (e.g. batteries containing lithium), sodium hydroxide (e.g. Red Devil Lye), petroleum ether/petroleum naphtha/white gas (e.g. Coleman Fuel, lighter fluid), muriatic acid, sulfuric acid, table salt, aluminum foil, plastic soda bottles (empty or no longer containing original contents), glass mason jars, plastic food storage containers, Ziplock-type plastic bags, plastic tubing, electrical tape and/or duct tape, coffee filters, pipe cutters (used to cut open lithium batteries), electric hot plates/electric skillets, frying pans, razor blades, digital scales, funnels, and stirring utensils.
2. Unidentified powders (processed/semi-processed precursors, chemicals).
3. Glass jars and plastic bottles/storage containers filled with unidentified liquids or sludges (processed/semi-processed precursors and other unidentified mixtures related to the manufacturing of methamphetamine)
4. Devices used to communicate with methamphetamine manufacturing co-conspirators including cellular telephones, pagers, and two-way radios; electronic equipment used for counter-surveillance to include scanners, anti-bugging devices, and video surveillance cameras..
5. Firearms, including but not limited to handguns, rifles, and shotguns that are commonly used by individuals to protect clandestine methamphetamine manufacturing related operations and controlled substances.
6. Books, receipts, ledgers, notes, and videos pertaining to the illicit manufacturing of methamphetamine and the purchasing, transporting, and preparation of methamphetamine precursors, chemicals, and equipment.
7. Messages/letters, telephone numbers/call records/contact information, names, and addresses relating to the illicit manufacturing of methamphetamine and the purchasing, transporting, and preparation of methamphetamine precursors, chemicals, and equipment. These messages/letters, telephone numbers/call records/contact information, names, and addresses may be written on personal calendars, personal address/telephone books, Rolodex type indices, notebooks, loose pieces of paper, and found in mail.
8. Photographs and videos depicting persons involved with/engaged in the manufacturing/use of methamphetamine and/or the purchasing, preparing, and storing of methamphetamine laboratory precursors, chemicals, and equipment.

ATTACHMENT B (Continued)

9. Items or articles of personal property tending to show ownership, dominion, or control of the premises/property/vehicles. Such items or articles include (but are not limited to) personal identification, personal correspondence, diaries, checkbooks, notes, photographs (including digital), keys, receipts, personal telephone and address books, videos, and motor vehicle related documents (titles/registrations).
10. Many of the items listed in Paragraphs 6 through 9 are commonly stored in/on digital media. Therefore, digital media (including but not limited to computers/computer hard drives, floppy disks, CD's, flash/jump drives, personal digital assistants (PDA's), cellular/smart telephones, digital cameras, iPODs, iPADs, etc.) are to be seized and examined specifically for the items listed in Paragraphs 6 through 9.

ATTACHMENT C

AFFIDAVIT of
Special Agent Brian Snedeker
Drug Enforcement Administration
Bristol, Virginia

1. I, Special Agent Brian Snedeker, being duly sworn hereby depose and say:
2. The purpose of this application and affidavit is to secure a search warrant for the premises known as 21011 Lovers Lane, Bristol, VA. This affiant, after obtaining and reviewing information, believes there is evidence of conspiracy to manufacture methamphetamine and/or manufacturing methamphetamine at 21011 Lovers Lane, Bristol, VA in violation of 21 USC 846/841(a)(1) and 841(a)(1).
3. I am a Special Agent with the Drug Enforcement Administration (DEA) and have been so employed for approximately (23) years. During my employment I have received comprehensive classroom training from the Drug Enforcement Administration in specialized narcotic investigative matters including but not limited to drug interdiction, drug detection, money laundering techniques and schemes, smuggling, and the investigation of individuals and organizations involving the smuggling, cultivation, manufacturing, and illicit trafficking of controlled substances and controlled substance precursors. I am a graduate of both the DEA's Clandestine Laboratory Investigation/Safety Certification Program and the DEA's Clandestine Laboratory Site Safety Officer School. I have participated in the execution of more than (300) narcotics related search warrants and the seizure and dismantling of more than (200) clandestine methamphetamine laboratories. I have testified as an expert on multiple occasions in Federal Court and State Court regarding the clandestine manufacturing of methamphetamine.
4. The facts set forth in this affidavit are known to me as a result of my personal participation and information provided to this affiant by a retail store loss prevention employee/manager and retail store employees of a retail store that sells instant cold packs and lithium batteries.
5. The manufacturing of methamphetamine (a Schedule II Controlled Substance) by way of the ammonium nitrate/lithium metal method (also known as the "shake and bake" or "one pot" method) requires pseudoephedrine/ephedrine (obtained through the processing of cold/allergy pills, tablets, gelcaps, and liquids containing pseudoephedrine or ephedrine), ammonium nitrate (found in instant cold packs), and lithium metal (found in lithium batteries). Other chemicals/ingredients commonly used during the ammonium nitrate/lithium metal method include sodium hydroxide (e.g. Red Devil Lye), petroleum ether/petroleum naphtha/white gas (e.g. Coleman Fuel, lighter fluid), acetone, muriatic acid, sulfuric acid, table salt, and aluminum foil. Equipment/tools commonly used during the manufacturing of methamphetamine include soda bottles, glass mason jars, plastic food storage containers, plastic tubing, electrical tape and/or duct tape, coffee filters, pipe cutters (often used to open lithium batteries), Ziplock-type plastic bags, frying pans/electric skillets/propane burners (to dry the methamphetamine), razor blades, digital scales, funnels, and stirring utensils.

6. Individuals who manufacture methamphetamine usually use and sell/trade the methamphetamine they manufacture. These manufacturers routinely have other persons (hereafter referred to as “shoppers”) assist them in the purchasing of precursors, chemicals, and equipment/supplies needed to manufacture methamphetamine. Manufacturers will regularly pay shoppers in methamphetamine (to use and sell) and/or cash for their assistance.
7. This affiant has reviewed pseudoephedrine sales data provided by a number of retailers (as required under The Combat Methamphetamine Epidemic Act of 2005) and sales data provided by a retail store that sells instant cold packs (ammonium nitrate) and noted the following information (not all inclusive):
 - On 11-14-2013, Charlie and Ronnie Brown each purchased (10) day supplies of pseudoephedrine within (9) minutes of each other at the same pharmacy in Bristol, VA.
 - On 11-25-2013, Charlie and Ronnie Brown each purchased (10) day supplies of pseudoephedrine at the same pharmacy in Bristol, VA.
 - On 12-07-2013, Charlie Brown purchased a (10) day supply of pseudoephedrine.
 - On 12-11-2013, Ronnie Brown purchased a (10) day supply of pseudoephedrine.
 - On 12-16-2013, Charlie Brown purchased a (10) day supply of pseudoephedrine.
 - On 12-19-2013, a beige Chevrolet Blazer registered to 21011 Lovers Lane, Bristol, VA was utilized by an individual to purchase an instant cold pack, (2) packages of lithium batteries, iodized salt, and (2) bottles of Gatorade (Gatorade and Powerade bottles are routinely used by methamphetamine manufacturers for reaction vessels due to the thick plastic walls of the bottles).
 - On 12-22-2013, Ronnie Brown purchased a (10) day supply of pseudoephedrine.
 - On 12-29-2013, Charlie Brown purchased a (10) day supply of pseudoephedrine.
 - On 01-05-2014, Ronnie Brown purchased a (10) day supply of pseudoephedrine.
 - On 01-15-2014, Ronnie Brown purchased a (10) day supply of pseudoephedrine.
 - On 01-16-2014, Charlie Brown purchased a (10) day supply of pseudoephedrine.
 - On 01-23-2014, Ronnie Brown purchased a (10) day supply of pseudoephedrine.
 - On 01-28-2014, Charlie Brown purchased a (10) day supply of pseudoephedrine.
 - On 02-04-2014, Ronnie Brown purchased a (10) day supply of pseudoephedrine.
 - On 02-06-2014, Charlie Brown purchased a (10) day supply of pseudoephedrine.

- On 02-07-2014, Ronnie Brown attempted to purchase a (10) day supply of pseudoephedrine.
- On 02-12-2014, Charlie and Ronnie Brown each attempted to purchased (10) day supplies of pseudoephedrine at the same pharmacy in Bristol, VA. The attempted purchases were within (3) minutes of each other.
- On 02-20-2014, Charlie and Ronnie Brown each purchased (10) day supplies of pseudoephedrine at the same pharmacy in Bristol, VA.
- On 03-05-2014, Charlie Brown purchased a (10) day supply of pseudoephedrine at a pharmacy in Bristol, VA. Within (7) minutes of Charlie Brown's purchase, Ronnie Brown attempted to purchase a (10) day supply of pseudoephedrine at the same pharmacy.
- On 03-06-2014, Ronnie Brown purchased an (8) day supply of pseudoephedrine.
- On 03-13-2014, Ronnie Brown purchased an (8) day supply of pseudoephedrine.
- On 03-19-2014, Charlie Brown purchased a (10) day supply of pseudoephedrine.
- On 03-23-2014, Ronnie Brown purchased an (8) day supply of pseudoephedrine.
- On 03-25-2014, Charlie Brown purchased a (10) day supply of pseudoephedrine.
- On 04-03-2014, Ronnie Brown purchased a (10) day supply of pseudoephedrine.
- On 04-05-2014, Charlie Brown purchased a (12) day supply of pseudoephedrine.
- On 04-12-2014, Ronnie Brown purchased a (10) day supply of pseudoephedrine.
- On 04-15-2014, Charlie Brown attempted to purchase a (10) day supply of pseudoephedrine at one pharmacy and approximately (20) minutes later he attempted to purchase a (10) day supply of pseudoephedrine at a different pharmacy.
- On 04-18-2014, Charlie Brown purchased a (10) day supply of pseudoephedrine.
- On 04-27-2014, Ronnie Brown purchased a (10) day supply of pseudoephedrine.
- On 05-02-2014, Charlie Brown purchased a (10) day supply of pseudoephedrine.
- On 05-09-2014, Ronnie Brown purchased a (12) day supply of pseudoephedrine.
- On 05-12-2014, Charlie Brown purchased a (10) day supply of pseudoephedrine.

8. On 05-12-2014, a federal search warrant was executed at the Brown brothers' residence (21011 Lovers Lane, Bristol, VA). An ammonium nitrate/lithium metal methamphetamine lab was seized as a result and both Ronnie and Charlie Brown (brothers) were charged (state) with methamphetamine manufacturing related offenses. Both brothers are currently out on bond relating to those charges.
9. This affiant recently spoke with the Bristol, VA, Target store Asset Protection Team Leader (APTL). The APTL advised this affiant that on 07-02-2014, he approached Ronnie Brown in the Bristol, VA Target store after observing what he believed to be Brown attempting to conceal a package of AA lithium batteries (the APTL thought that Brown was going to discreetly open the package, remove the batteries, and then walk out of the store with said batteries). The APTL advised Brown that he was aware of what Brown was attempting to accomplish. Brown then left the store, leaving the package of lithium batteries behind.
10. This affiant recently reviewed sales data provided by a retail store that sells instant cold packs (ammonium nitrate). The data revealed the following:
 - On 07-02-2014, the beige Chevrolet Blazer registered to 21011 Lovers Lane, Bristol, VA (and regularly operated by Ronnie Brown – as witnessed by this affiant on multiple occasions) was utilized by an individual to purchase an instant cold pack. This was the same date that Ronnie Brown was in possession of lithium batteries in the Bristol, VA Target store (reference ¶9 above).
 - On 07-10-2014, the beige Chevrolet Blazer registered to 21011 Lovers Lane, Bristol, VA was utilized by an individual to purchase an instant cold pack. [A review of the in store security video relating to this purchase was viewed by this affiant. In the video, this affiant saw that Ronnie Brown, Charlie Brown, and an unidentified male were at the checkout line together. Charlie Brown obtained/purchased the instant cold pack.]
 - On 07-19-2014, a subject traveling in a motor vehicle purchased a bottle of Powerade and asked for salt at a retail store in the Bristol, VA area. Law enforcement observed the same vehicle (same license plates) parked at 21011 Lovers Lane, Bristol, VA during the late night of 07-15-2014. [The reaction vessel/cook bottle that was seized from 21011 Lovers Lane, Bristol, VA on 05-12-2014 (reference ¶8 above) was a Powerade bottle. During the methamphetamine manufacturing process, manufacturers most often mix sulfuric acid with table salt in order to create HCL gas. Sulfuric acid and an empty (20) ounce container of salt was seized with the methamphetamine lab at 21011 Lovers Lane, Bristol, VA on 05-12-2014.]
 - On 07-23-2014, the beige Chevrolet Blazer registered to 21011 Lovers Lane, Bristol, VA was utilized by an individual to purchase an instant cold pack and coffee filters.
 - On 07-28-2014, one of the Brown brothers (the retail store employee was unsure if it was Ronnie or Charlie as the employee does not know their first

names) accompanied an individual who purchased an instant cold pack. [This affiant knows the subject who purchased the instant cold pack as a person who regularly purchases pseudoephedrine and instant cold packs. The subject last purchased pseudoephedrine and an instant cold pack on 08-01-2014.]

- On 07-29-2014, the beige Chevrolet Blazer registered to 21011 Lovers Lane, Bristol, VA was utilized by an individual to purchase an instant cold pack.

11. Pseudoephedrine, lithium (batteries), and ammonium nitrate (instant cold packs) are key ingredients to the manufacturing of methamphetamine via the ammonium nitrate/lithium metal method. During the last several years, this affiant has routinely found and seized (via search warrants and consent searches) the aforementioned ingredients (and packaging of same) at methamphetamine manufacturing/precursor preparation sites. This affiant has encountered and seized said ingredients at such sites in various forms/stages (e.g. sludges/mixed with liquids) related to methamphetamine production and contained in a variety of glass and plastic containers days, weeks, and even months after the ingredients were purchased at pharmacies/retail stores.
12. This affiant is aware based on his training, experience, and conversations with other law enforcement officers that individuals who illegally manufacture methamphetamine and/or conspire to do so typically maintain methamphetamine manufacturing precursors/chemicals/equipment (as described in paragraph #5 above) along with receipts / notes / messages / records / telephone numbers / contact data and related call logs (all pertaining to manufacturing/conspiracy to manufacture methamphetamine), and other items as listed and explained on Attachment B (of the Application and Affidavit for Search Warrant to which this affidavit is attached) on their persons, inside their residences, garages, outbuildings/barns, campers, vehicles (or the vehicles they operate), and inside of vehicles registered to other persons when those vehicles are parked at the manufacturer's/conspirator's residence/property. This affiant routinely encounters the aforementioned messages, telephone numbers, call logs, and contact information relating to methamphetamine manufacturing co-conspirators in cellular/smart telephones encountered at/seized from the above listed locations during the course of executing search warrants that authorized the search for such items/data from cellular telephones (and other digital media) at methamphetamine manufacturers'/co-conspirators' residences/properties/vehicles.
13. Individuals who manufacture methamphetamine and/or conspire to do so routinely have persons who are methamphetamine users and/or additional co-conspirators (i.e. shoppers) present at their residences/properties. These users/co-conspirators often illegally possess methamphetamine and methamphetamine use paraphernalia and routinely possess notes, stored telephone numbers, contact data, and messages pertaining to their relationships with methamphetamine manufacturers/manufacturing co-conspirators. These users/co-conspirators are oftentimes in possession of other items as listed and explained on Attachment B (of the Application and Affidavit for Search Warrant to which this affidavit is attached) and possess these items on their persons and in their vehicles (or the vehicles they operate) which are oftentimes parked at the drug manufacturer's/co-conspirator's residences/properties.

14. The clandestine manufacturing of methamphetamine is an extremely dangerous process that involves the use of toxic, flammable, explosive, and incompatible chemicals. Explosions, fires, and toxic gasses generally pose the greatest threats to law enforcement officers executing search warrants at methamphetamine manufacturing sites. It is not uncommon for methamphetamine manufacturers to panic when they become aware of a law enforcement presence at a methamphetamine manufacturing site. As a result of their panic, methamphetamine manufacturers have been known to attempt to dispose of evidence of their manufacturing by throwing/pouring chemicals into toilets, bathtubs, and sinks before law enforcement can gain entry and secure the premises. The pouring/mixing of the various chemicals during the attempted disposal creates an increased risk of explosion, fire, and toxic gas exposure due to the nature of the chemicals involved. This affiant believes that the above presents reasonable suspicion that knocking and announcing the presence of law enforcement officers at the time of the execution of this search warrant would prove dangerous to the law enforcement officers involved in the execution of the search warrant.
15. Ronnie and Charlie Brown's known residence is 21011 Lovers Lane, Bristol, VA.
16. Based upon the facts set forth above, I believe that there is probable cause for the issuance of a search warrant for the premises known as 21011 Lovers Lane, Bristol, VA (located within the Western District of Virginia) as there is probable cause to believe that there is evidence of a violation of 21 USC 846/841(a)(1) and/or 841(a)(1) at said premises.

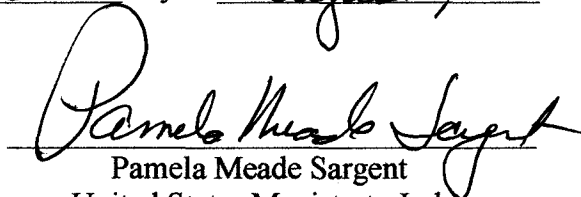


Brian Snedeker, Special Agent (DEA)

8-5-2014

Date

Subscribed and sworn to before me, this the 5th day of August, 2014.
in Abingdon, Virginia.



Pamela Meade Sargent
United States Magistrate Judge
Western District of Virginia